

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN

JACK LIPTON,

Plaintiff,

Case No. 24-1029

v.

Hon. Hala Y. Jarbou

MICHIGAN STATE UNIVERSITY  
BOARD OF TRUSTEES, DIANNE  
BYRUM, in her individual and official  
capacities, DENNIS DENNO, in his  
individual and official capacities, DAN  
KELLY, in his individual and official  
capacities, RENEE KNAKE JEFFERSON,  
in her individual and official capacities,  
SANDY PIERCE, in her individual and  
official capacities, BRIANNA T. SCOTT,  
in her individual and official capacities,  
KELLY TEBAY, in her individual and official  
capacities, and REMA VASSAR, in her  
individual and official capacities,

Defendants.

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**DEFENDANT DENNIS DENNO’S RESPONSE TO PLAINTIFF’S EXPEDITED  
MOTION TO PERMIT LIMITED DISCOVERY PRIOR TO A RULE 26(f)  
CONFERENCE**

Defendant Dennis Denno (“Mr. Denno”), through his attorneys, Starr, Butler, & Stoner, PLLC, states as follows for his Response to Plaintiff’s Expedited Motion to Permit Limited Discovery Prior to a Rule 26(f) Conference (ECF No. 47):

Mr. Denno does not object to the relief requested in Plaintiff’s Expedited Motion to Permit Limited Discovery Prior to a Rule 26(f) Conference (ECF No. 47), so long as Plaintiff agrees to voluntarily produce any and all responsive documents and things produced by Ms. Chola.

On April 17, 2025, the undersigned counsel met and conferred with Plaintiff’s counsel via telephone regarding Plaintiff’s Expedited Motion to Permit Limited Discovery Prior to a Rule

26(f) Conference (ECF No. 47). During the conference, Plaintiff's counsel agreed to voluntarily produce any and all responsive documents produced by Ms. Chola without need for a formal discovery request from Mr. Denno's counsel.

Finally, Mr. Denno expressly denies any and all wrongdoing alleged in Plaintiff's Expedited Motion to Permit Limited Discovery Prior to a Rule 26(f) Conference (ECF No. 47).

Respectfully submitted,

STARR, BUTLER, & STONER, PLLC

By: s/ Daniel C. Waslawski  
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Dated: April 22, 2025

**CERTIFICATE OF SERVICE**

The undersigned says that on April 22, 2025, she has caused to be served a copy of **Defendant Dennis Denno's Response to Plaintiff's Expedited Motion to Permit Limited Discovery Prior to a Rule 26(F) Conference and this Certificate of Service** via the Court's electronic filing system upon all attorneys of record.

s/ Kiersten Plane